

Presentment Date and Time: October 25, 2017 at 12:00 p.m. (Prevailing Eastern Time)

Objection Date and Time: October 24, 2017 at 4:00 p.m. (Prevailing Eastern Time)

Hearing Date and Time: To be scheduled if an Objection is filed

BROWN RUDNICK LLP

Seven Times Square
New York, NY 10036
Telephone: (212) 209-4800
Facsimile: (212) 209-4801

Counsel to Bellair Development Group S.A.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	
	:	Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13555 (SCC)
Debtors.	:	Jointly Administered

**NOTICE OF PRESENTMENT OF CONSENT MOTION FOR
SUBSTITUTION OF COUNSEL FOR BELLAIR DEVELOPMENT GROUP S.A.**

PLEASE TAKE NOTICE that Brown Rudnick LLP (“Brown Rudnick”), will present the annexed Consent Motion for Substitution of Counsel for Bellair Development Group S.A. (the “Motion”) and proposed order (the “Proposed Order”) to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for signature on October 25, 2017 at 12:00 p.m. (Prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that unless a written objection to the Motion and the Proposed Order, with proof of service, is served and filed with the Clerk of the Court and a courtesy copy is delivered to the Bankruptcy Judge’s chambers and: (i) the undersigned; (ii) attorneys for LBHI, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Garret A. Fail, Esq.); and (iii) the Office of the United States Trustee for Region 2, U.S. Federal Office Building, 201 Varick Street, Suite 1006, New York, New York 10014 (Attn: Andrea B. Schwartz, Esq.) so as to be received by October 24, 2017 at 4:00 p.m. (Prevailing

Eastern Time), there will not be a hearing and the Proposed Order may be signed. If a written objection is timely served and filed, a hearing (the “Hearing”) will be held to consider the Motion and the Proposed Order at a date and time to be determined before the Honorable Shelley C. Chapman, United States Bankruptcy Judge, at the United States Bankruptcy Court, Courtroom 623, One Bowling Green, New York, New York 10004. Objecting parties are required to attend the Hearing and failure to appear may result in relief being granted or denied upon default.

Dated: October 10, 2017
New York, New York

BROWN RUDNICK LLP

By: /s/ Bennett S. Silverberg
Bennett S. Silverberg
Gerard T. Cicero
Seven Times Square
New York, NY 10036
Telephone: (212) 209-4800
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Counsel to Bellair Development Group S.A.

Presentent Date and Time: October 25, 2017 at 12:00 p.m. (Prevailing Eastern Time)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	
	:	Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	08-13555 (SCC)
Debtors.	:	Jointly Administered

**CONSENT MOTION FOR SUBSTITUTION OF
COUNSEL FOR BELLAIR DEVELOPMENT GROUP S.A.**

Pursuant to Rule 2090-1(e) of the Local Rules of the Bankruptcy Court for the Southern District of New York (the “Local Rules”), Brown Rudnick LLP (“Brown Rudnick”) respectfully seeks to be substituted for and to replace Norton Rose Fulbright US LLP (“Norton Rose Fulbright”) as counsel for Bellair Development Group S.A. (the “Client”), in the above-captioned bankruptcy proceeding and states as follows:

1. The Client has requested and consents to the substitution of Brown Rudnick, for Norton Rose Fulbright, as its counsel and counsel of record in the above-captioned proceeding.
2. Brown Rudnick and Norton Rose Fulbright consent to the substitution as described in paragraph 1.
3. Based on the foregoing, good cause exists to permit Brown Rudnick to substitute for Norton Rose Fulbright as counsel of record under Local Rule 2090-1(e).

WHERFORE, Brown Rudnick respectfully requests that the Court enter an order in the form attached hereto as Exhibit A.

Dated: October 10, 2017
New York, New York

BROWN RUDNICK LLP

By: /s/ Bennett S. Silverberg
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New York, NY 10036
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Counsel to Bellair Development Group S.A.

CONSENTED TO:

NORTON ROSE FULBRIGHT US LLP

By: /s/ Robert A. Schwinger
Robert A. Schwinger
1301 Avenue of the Americas
New York, New York 10019
Telephone: (212) 318-3000
Facsimile: (212) 318-3400

Retiring Counsel to Bellair Development Group S.A.

Exhibit A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	Chapter 11 Case No.
	:	08-13555 (SCC)
Debtors.	:	Jointly Administered

**ORDER GRANTING MOTION FOR SUBSTITUTION
OF COUNSEL ON CONSENT FOR BELLAIR DEVELOPMENT GROUP S.A.**

Upon consideration of the Motion For Substitution of Counsel on Consent for Bellair Development Group S.A. (the “Motion”) filed by Brown Rudnick LLP pursuant to Rule 2090-1(e) of the Local Rules of the Bankruptcy Court for the Southern District of New York; and due and proper notice of the Motion having been provided in accordance with the procedures set forth in the Second Amended Case Management Order entered June 17, 2010 governing case management and administrative procedures [Docket No. 9653]; and no objection having been filed by the objection deadline of October 24, 2017 at 4:00 p.m. (Prevailing Eastern Time); and after due deliberation and sufficient cause appearing therefor, it is:

ORDERED, that the Motion is granted; and it is further

ORDERED, that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and/or interpretation of this order.

Dated: _____, 2017
New York, New York

**HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE**